

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ADAM FERRARI,

Plaintiff,

v.

WILLIAM FRANCIS,

Defendant.

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CIVIL ACTION NO. 3:23-CV-455-S

JOINT STATUS REPORT

Plaintiff Adam Ferrari and Defendant William Francis, (collectively the “Parties”) file this Joint Status Report in accordance with the Electronic Order of December 20, 2023 [Dkt. 44].

1. As directed by the Court, in-person mediation is scheduled on March 6, 2024, the first date on which Judge Ferguson, all counsel, and all clients were also available.¹

2. The parties have resolved most but not all issues regarding Ferrari’s discovery requests. Additionally, the parties anticipate the Court’s assistance may be required to resolve issues related to discovery requests served by Francis following the last hearing.

3. After receipt of Francis’s discovery requests and after mediation was scheduled, Ferrari proposed a partial stay of discovery in this case and a total stay of the two other pending but related cases. While Francis did not agree to a total stay in the Texas State Case or the North Dakota Case, as will be discussed in Ferrari’s forthcoming motion to stay, Francis has agreed to a partial stay of discovery in this case subject to the Court’s approval, which will be presented to the Court pursuant to a motion.

¹ The mediation will address all three pending cases.

4. Accordingly, Francis proposes continuation of the Court's consideration of his pending motion for protective order and postponement of any further hearing regarding discovery issues, until mediation is completed.

By: /s/ Charlene C. Koonce

Charlene C. Koonce
State Bar No. 11672850
charlene@brownfoxlaw.com
BROWN FOX PLLC
8111 Preston Road, Suite 300
Dallas, Texas 75225
T: (214) 327-5000
F: (214) 327-5001

Attorneys for Defendant William Francis

By: /s/ Ross Good, Esq.

Ross Good, Esq.
ross@loftusandeisenberg.com
LOFTUS & EISENBERG, LTD.
161 N. Clark, Suite 1600
Chicago, Illinois 60601
Telephone: (786-539-3952

Attorneys for Plaintiff Adam Ferrari

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(d)(1)(B), as amended, no certificate of service is necessary, because this document is being filed with the Court's electronic-filing system.